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JUN 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

LINDA L. OLIVER
COUNSEL
DIRECT DIAL (202) 637-6527

June 1, 1994

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

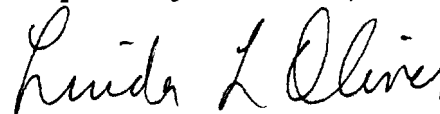
**Re: Notice of Ex Parte Communication in
Gen. Docket No. 93-252**

Dear Mr. Caton:

On June 1, 1994, on behalf of LDDSMetromedia Corporation, I met with Judy Argentieri of the Tariff Division to discuss the equal access obligations of cellular and other commercial mobile radio service providers. The position taken by LDDS in today's meeting was consistent with the comments it filed as LDDS Communications, Inc., jointly with the Advanced Telecommunications Corporation, on September 3, 1992, in RM-8012. 1/ In those comments, LDDS supported MCI's request that the Commission begin a rulemaking to require cellular licensees to interconnect with interexchange carriers via uniform, nationwide equal access procedures. LDDS also supports the commencement of such a rulemaking with respect to other commercial mobile radio service providers.

Please contact the undersigned if you have any questions.

Respectfully submitted,



Linda L. Oliver

Enclosure

cc: Judy Argentieri

1/ A copy of those comments is attached to this letter.

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Before the
FEDERAL COMMUNICATION COMMISSION
Washington, DC 20554

In the Matter of
Policies and Rules
Pertaining to the
Equal Access Obligations
of Cellular Licensees

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RM-8012

COMMENTS OF
ADVANCED TELECOMMUNICATIONS CORPORATION
AND LDDS COMMUNICATIONS, INC.

Pursuant to the Commission's Notice (DA 92-745) released on June 10, 1992, Advanced Telecommunications Corporation ("ATC") and LDDS Communications, Inc. ("LDDS") hereby comment on MCI's petition for rulemaking to require that all cellular licensees interconnect with interexchange carrier via uniform, nationwide, cellular equal access policies and procedures. ATC and LDDS agree with MCI that the Commission should initiate a rulemaking proceeding.

ATC and LDDS are both full-service long distance carriers serving the Southeast, South Central, Southwest, and Midwest regions of the country. ATC and LDDS provide a wide range of long distance services including MTS on a presubscription basis from equal access areas. ATC and LDDS are familiar with the frustration experienced by the end users of non-BOC cellular systems who are forced to accept service from interexchange carriers chosen by the mobile service providers. Many ATC and LDDS end users subscribe to mobile services of non-BOC cellular providers and are upset that they cannot choose ATC or LDDS for their long distance carriage. As MCI

notes, these customers are often charged premium "full market rates" for resold long distance service.¹

ATC and LDDS believe it is unfair that customers of non-BOC cellular systems cannot choose the long distance carrier of their liking. The end user deserves a choice for both his cellular system and for interexchange service. Moreover, given that cellular is a substitute for monopoly local exchange service, then cellular should have equal access requirements similar to those imposed on landline local exchange carriers.

Mobile services are an ever expanding mode of communications. The growth of the cellular market has been well documented.² Knowing that cellular phone service is available throughout the United States at affordable rates, ATC and LDDS believe increasing numbers of non-BOC cellular users will demand a choice for their long distance traffic. It is quite obvious to ATC and LDDS that this market has matured to a point that the Commission should require equal access for IXCs from all cellular licensees.

In its petition, MCI succinctly expressed the public interest reasons for requiring non-BOC cellular carriers to provide equal access.³ ATC and LDDS fully support MCI's request that all cellular licensees be required to interconnect with interexchange

¹ See MCI petition at 5.

² See MCI petition at 1-2.

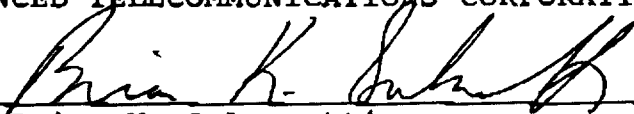
³ See MCI petition at 5-6.

carriers (IXCs) via uniform, nationwide, cellular equal access providers and procedures. ATC and LDDS agree that a rulemaking proceeding is appropriate to consider MCI's request.

Respectfully submitted,,

ADVANCED TELECOMMUNICATIONS CORPORATION

BY:



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LDDS COMMUNICATIONS, INC.

BY:



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Vice President, Federal Affairs
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(202) 429-2035

September 3, 1992

Certificate of Service

I, Christine Botelho, do hereby certify that this 3rd day of September, 1992 a copy of the foregoing "Comments of Advanced Telecommunications Corporation" and "LDDS Communications, Inc." in RM-8012 was sent by first class mail to the following:

Mr. Michael Mandigo
Federal Communications Commission
Common Carrier Bureau
1919 M. Street, N.W.
Washington, DC 20554

Downtown Copy Center
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Christine Botelho